

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

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| VIRTAMOVE, CORP., | § | |
| Plaintiff, | § | Case No. 2:24-cv-00093-JRG |
| | § | (Lead Case) |
| v. | § | |
| | § | |
| HEWLETT PACKARD ENTERPRISE | § | JURY TRIAL DEMANDED |
| COMPANY, | § | |
| Defendants. | § | |
| | § | |
| | § | |
| <hr/> | § | |
| VIRTAMOVE, CORP., | § | |
| Plaintiff, | § | Case No. 2:24-cv-00064-JRG |
| | § | (Member Case) |
| v. | § | |
| | § | |
| INTERNATIONAL BUSINESS | § | JURY TRIAL DEMANDED |
| MACHINES CORP., | § | |
| Defendants. | § | |
| | § | |

**DEFENDANT HPE'S UNOPPOSED MOTION TO EXTEND DEADLINE
TO RESPOND TO PLAINTIFF'S FIRST AMENDED COMPLAINT**

Defendant Hewlett Packard Enterprise Company (“HPE”) respectfully submits this Unopposed Motion to Extend the Deadline to Respond to Plaintiff’s First Amended Complaint Against HPE (“First Amended Complaint”) [Dkt. No. 40].

Plaintiff filed its First Amended Complaint on May 13, 2024. Currently, the deadline for HPE to respond to Plaintiff’s First Amended Complaint is Tuesday, May 28, 2024. Fed. R. Civ. P. 15(a)(3). Given the federal holiday and the schedules of counsel, HPE respectfully requests a brief extension to respond to the First Amended Complaint until and including Friday, June 7, 2024.

This extension is not sought for purposes of delay, and HPE does not anticipate that this extension will affect any other expected deadlines in this case.

Plaintiff is not opposed to the relief requested in this motion.

As such, HPE respectfully requests this Court grant an extension until and including Friday, June 7, 2024 for HPE to respond to Plaintiff's First Amended Complaint.

Respectfully submitted,

/s/ Jennifer H. Doan

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Attorneys for Hewlett Packard Enterprise Company

CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record are being served with a copy of this document via the Court's CM/ECF system on May 23, 2024.

/s/ Jennifer H. Doan

Jennifer H. Doan

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that pursuant to Local Rule CV-7(h), counsel for Defendants conferred with counsel for Plaintiff on May 23, 2024. Plaintiff is not opposed to the relief requested in this motion.

/s/ Jennifer H. Doan

Jennifer H. Doan